

**BROMBERG LAW OFFICE, P.C.**

Brian L. Bromberg (Admitted in NY, NJ & CA)

352 Rutland Road #1  
Brooklyn, NY 11225  
Phone: (212) 248-7906  
Fax: (212) 248-7908

February 3, 2023

**Via ECF**

Honorable Ronnie Abrams, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Elfe v. 26 Motors Corp., et al., 22-CV-9385 (RA)

Dear Judge Abrams:

My office, together with co-counsel, represents the plaintiff, Glenn C. Elfe, in the above-referenced auto-fraud case against Defendants 26 Motors Corp, Kyle Merritt, Chino Germinal Lantigua, John Doe #3 a/k/a Manager, Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey.

I am writing to request that Your Honor adjourn the Rule 16 Conference scheduled for February 10, 2023 by 45 days and extend today's deadline for submitting the proposed case management plan and joint letter by 45 days as well. Defendants 26 Motors Corp., Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey join in this request. This is the parties' second request to adjourn the initial conference.

I am making this request because Plaintiff needs to serve the Amended Complaint on the two John Does whose full names Plaintiff has only recently learned: Kyle Merritt and Chino Germinal Lantigua. I am sending the Amended Complaint out for service tomorrow morning.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: All Attorneys of Records (Via ECF)  
Thomas R. Breeden, Esq. (Via Email: [trb@tbreedenlaw.com](mailto:trb@tbreedenlaw.com))